

REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful review of this application. Claims 1-19 have been rejected. Claims 10-19 have been amended. Applicants respectfully request reconsideration of the application in view of the above amendment and the following remarks submitted in support thereof.

Claim Objections

Original claims 11-20 have been misnumbered. Accordingly, the numbering of original claims 11-20 have been amended such that the numbers are consecutive with respect to claims 1-9. Additionally, the dependencies of the claims have been amended to reflect the renumbering. As such, Applicants respectfully request the Examiner to withdraw the claim objections.

Obviousness Rejections under 35 U.S.C. §103(a)

Claims 1-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Java Media Framework API Guide* (November 19, 1999) <<http://java.sun.com/products/java-media/jmf/2.1.1/guide/JMFTOC.html>> (herein referred to as “Java Guide”) in view of Pham et al., *A Situated Computing Framework for Mobile and Ubiquitous Multimedia Access using Small Screen and Composite Devices* (2000). As will be fully explained below, the combination of Java Guide in view of Pham et al. does not raise a *prima facie* case of obviousness against independent claims 1, 9, and 17.

Independent claims 1, 9, and 17 define mobile multimedia framework application program interfaces (API) capable of operation in mobile hardware devices. In particular, a memory size of the mobile multimedia framework API is less than 100 kilobytes. Furthermore, independent claim 1 defines a mobile multimedia framework API that consists

of a playback interface, a control interface, an event listener interface, an error list interface, an exceptions interface, an events interface, and a protocol handler interface. Independent claims 9 and 17 define a playback interface consisting of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, and a media locator API.

In support of the obviousness rejection, the Examiner notes that Java Guide discloses a mobile multimedia framework API that consists of a playback interface, a control interface, an event listener interface, an error list interface, an exceptions interface, an events interface, and a protocol handler interface, as defined in independent claim 1, and a playback interface consisting of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, and a media locator API, as defined in independent claims 9 and 17. Applicants respectfully traverse the Examiner's characterizations in this regard because the portions of the reference relied upon by the Examiner do not teach the mobile multimedia framework API as defined in independent claim 1 and the playback interface as defined in independent claims 9 and 17.

In particular, the Examiner simply cites to elements disclosed in separate portions of the Java Guide (e.g., Figures 2-3 and 2-11 and pages 1-2, 4, 5, 7, 18, etc.). However, the Java Guide additionally discloses many other APIs but does not disclose anywhere that the cited elements are grouped together. In contrast, independent claim 1 defines a mobile multimedia framework API that consists of a playback interface, a control interface, an event listener interface, an error list interface, an exceptions interface, an events interface, and a protocol handler interface, and independent claims 9 and 17 define a playback interface consisting of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, and a media locator API. According to M.P.E.P. §2111.03, the transitional

phrase “consisting of” excludes any element, step, or ingredient not specified in the claim.

As Java Guide does not disclose the specific grouping of the cited elements, Java Guide cannot reasonably be considered to disclose or suggest to one having ordinary skill in the art a mobile multimedia framework API that consists of a playback interface, a control interface, an event listener interface, an error list interface, an exceptions interface, and events interface, as defined in independent claim 1, and a playback interface consisting of a manager API, a package manager API, a player API, a time API, a time base API, a system time base API, and a media locator API, as defined in independent claims 9 and 17.

To establish a prima facie case of obviousness based on a combination of references, there additionally must be some suggestion or motivation, either in the references or in the knowledge generally available to one having ordinary skill in the art, to combine the references in the manner proposed. As will be explained below, the Examiner has not established a prima facie case of obviousness against the claimed subject matter because one having ordinary skill in the art would not have combined Java Guide and Pham et al. in the manner proposed by the Examiner.

In support of the obviousness rejection, the Examiner notes that although neither Java Guide nor Pham et al. teaches the memory size of the mobile multimedia framework API being less than 100 kilobytes, “it would have been obvious to one of ordinary skill in the art to implementing a small framework because of the resource constraints of the mobile devices” (see Office Action mailed July 29, 2004 at pages 3-4). Applicants respectfully traverse the Examiner’s characterization in this regard because the portions of Pham et al. relied upon by the Examiner (abstract; page 323; and page 329 regarding system interactivity) do not suggest that having a mobile multimedia framework API that is less than

100 kilobytes is common knowledge or well-known in the art, and the portions do not provide the suggestion or motivation to combine the references in the manner proposed.

In particular, the Examiner cites to a section in Pham et al. on system interactivity that discloses a PDA-Composite Device-Architecture “requires the development of a newly user interface to control and interact with requested services” (page 329). However, Pham et al. disclose the mobile user interface in the context of “PC mouse and keyboard can be used as input devices,” “a slideshow can be annotated either using the mouse and keyboard,” and a “Wireless Mouse Cursor Control via PDA” (page 329). Accordingly, Pham et al. teach the mobile user interface as a hardware device used by a user to interface with a computer. In contrast, Java Guide teaches *application programming interfaces* (API) that are not related to hardware devices. Accordingly, having the memory size of the mobile multimedia framework API to be less than 100 kilobytes is not considered to be common knowledge or well-known in the art. Furthermore, there is no motivation or suggestion to combine the references because nothing in Java Guide teaches or suggests the APIs being applied to small screen devices. Thus, the Applicants respectfully traverse the Examiner’s assertion and, in accordance to M.P.E.P. §2144.03, ask the Examiner to provide documentary evidence of a mobile multimedia framework API that is less than 100 kilobytes in the next Office Action if the rejection is to be maintained.

Accordingly, for the above-stated reasons, Applicants submit that independent claims 1, 9, and 17 are patentable under 35 U.S.C. §103(a) over Java Guide in view of Pham et al. Claims 2-8, 10-16, and 18-19, each of which depends directly or indirectly from independent claims 1, 9, and 17, are likewise patentable under 35 U.S.C §103(a) over Java Guide in view of Pham et al. for at least the same reasons set forth for independent claims 1, 9, and 17. As a

result, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. §103(a) rejection for claims 1-19.

Conclusion

In view of the foregoing, the Applicants respectfully submit that all the pending claims 1-19 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 749-6900 ext. 6924. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP011). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
MARTINE & PENILLA, L.L.P.



Michael K. Hsu, Esq.
Reg. No. 46,782

Martine & Penilla, LLP
710 Lakeway Drive, Suite 170
Sunnyvale, California 94085
Telephone: (408) 749-6900
Customer Number 32,291